

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

LECLERES RAMOS RODOLFO
XXX-XX-7008

VAZQUEZ RIVERA LEONILDA
XXX-XX-3705

DEBTORS

CASE NO 18-06867/BKT

CHAPTER 7

**DEBTORS' MOTION TO CONDUCT §341 MEETING OF CREDITORS
THROUGH INTERROGATORIES AS TO THE DEBTOR
RODOLFO LECLERES RAMOS
AND TO ALLOW JOINT PETITIONER LEONILDA VAZQUEZ RIVERA
TO APPEAR AT §341 MEETING ON BEHALF OF THE DEBTOR**

TO THE HONORABLE COURT:

COME NOW, RODOLFO LECLERES RAMOS and LEONILDA VAZQUEZ RIVERA, the Debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. The Debtors filed a voluntary petition pursuant to 11 U.S.C. §§701, *et seq.*, on November 28, 2018. Wigberto Lugo Mender, Esq., was appointed Chapter 7 Trustee in the present case.
2. That the Debtor Rodolfo Lecleres Ramos has a medical condition that prevents him from appearing at the 341-7 meeting in the present case.
3. That Chapter 7 Trustee has no objection to the Debtor's request to excuse the Debtor and that the 341 meeting be conducted through interrogatories only as to the Debtor Rodolfo Lecleres Ramos.

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4. Therefore, the Debtors hereby respectfully request the Court to Order that the Debtor Rodolfo Lecleres Ramos be excused from appearing at the scheduled §341 meeting of creditors and in lieu thereof the Debtor be permitted to submit answers to the interrogatories in the present case.

5. Furthermore, the Debtors respectfully request that the Joint Debtor Leonilda Vazquez Rivera be allowed to appear at the 341 meeting also on behalf of the Debtor Rodolfo Lecleres Ramos.

WHEREFORE, the Debtors, through the undersigned attorney, respectfully request that for the above stated reasons this Honorable Court grant the present motion and Order:

- (a) That the Debtor Rodolfo Lecleres Ramos be excused from appear at the 341 meeting of creditors allowing the Debtor to lieu thereof, submit answers to the interrogatories, and
- (b) Order that the Joint Debtor Leonilda Vazquez Rivera to appear at the 341 meeting also on behalf of the Debtor Rodolfo Lecleres Ramos, in the present case.

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NOTICE

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to all CM/ECF participants including to Wigberto Lugo Mender, Esq., Chapter 7 Trustee; I also certify that a copy of this motion was sent via US Mail to the Debtors Rodolfo Lecleres Ramos and Leonilda Vazquez Rivera, PO Box 5597, Caguas PR 00725; and to all creditors and parties in interest (CM/ECF non-participants) as per attached master address list.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 19th day of December, 2018.

/s/Roberto Figueroa Carrasquillo
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District of Puerto Rico
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